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**UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK**

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**In Re DMCA Subpoena to Google, LLC.**

**X Case No. 7:21-mc-486**  
**:**  
**:**  
**:** **Watch Tower Bible and Tract**  
**:** **Society's Request to the Clerk for**  
**:** **Issuance of Subpoena to Google,**  
**:** **LLC Pursuant to 17 U.S.C. §**  
**:** **512(h) to Identify Alleged**  
**:** **Infringer**  
**:**  
**X**  
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Petitioner, Watch Tower Bible and Tract Society of Pennsylvania (hereinafter "Watch Tower") through its undersigned counsel of record, hereby requests that the Clerk of this Court issue a subpoena to Google, LLC to identify alleged infringers at issue, pursuant to the Digital Millennium Copyright Act ("DMCA"), 17 U.S.C. § 512(h) (hereinafter the "DMCA Subpoena"). The proposed DMCA Subpoena is attached hereto as Exhibit A.

The DMCA Subpoena is directed to Google, LLC, the service provider of a post to which the infringing party using the name "John Caicedo" (iris3dgames@gmail.com) posted content at the URL:

[https://drive.google.com/file/d/1WZRNEoBCnGkS5Jz2uHiSzQBrdUts\\_noV/view](https://drive.google.com/file/d/1WZRNEoBCnGkS5Jz2uHiSzQBrdUts_noV/view)

Watch Tower conducted a good-faith fair use analysis of the infringing post(s) on the account at issue. This content infringes a copyright held by Watch Tower. (*See* Declaration of Paul D. Polidoro dated June 10, 2021 (hereinafter “Polidoro Decl.”)).

Watch Tower has satisfied the requirements for issuance of a subpoena pursuant to 17 U.S.C. § 512(h), namely:

- (1) Watch Tower has submitted a copy of the notification sent pursuant to 17 U.S.C. § 512(c)(3)(A) as Exhibit 1 to the Declaration of Paul D. Polidoro.
- (2) Watch Tower has submitted the proposed DMCA Subpoena attached hereto as Exhibit A; and
- (3) Watch Tower, through its counsel of record, has submitted a sworn declaration confirming that the purpose for which the DMCA subpoena is sought is to obtain the identity of an alleged infringer or infringers, and that such information will only be used for the purpose of protecting Watch Tower’s rights under Title 17 U.S.C. §§ 100, et. seq.. *See* Polidoro Decl., ¶ 4.

Having complied with the statutory requirements, Watch Tower respectfully requests that the Clerk expeditiously issue and sign the proposed DMCA Subpoena pursuant to 17 U.S.C. § 512(h)(4).

Dated: June 10, 2021

/s/ Paul D. Polidoro  
Paul D. Polidoro  
Associate General Counsel  
SDNY Bar No. PP2509  
WATCH TOWER BIBLE AND TRACT  
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